

GDP-0444

LOCKHEED MARTIN

# Memorandum

**DRAFT****Date:****To:** F. R. Mynatt**c:** H. T. Conner, H. L. Fellers, Jr., J. M. Forstrom, M. A. Harrison, S. T. Holder, J. C. Massey,R. S. McKeehan, F. Perez, L. D. Perkins, C. H. Peterson, J. S. Rayside, M. H. Schiering  
D. W. Sheffey, A. E. Stuart, T. D. Taylor, H. D. Whitehead, R. M. Wilkerson,  
S. R. Wilson, HS-DMC - RC**From:** L. A. Felton, K-1001, MS-7133, 4-7930**Subject:** Highly Hazardous Chemical Inventory Assessment

As requested in your September 9, 1996 correspondence, the Environmental Management & Enrichment Facilities (EMEF) Business Unit has assessed hazardous material inventories and projected usages at the K-25 Site, Paducah Gaseous Diffusion Plant, and Portsmouth Gaseous Diffusion Plant. Assessment of inventories at EMEF-operated facilities at the X-10 and Y-12 sites were performed by the respective sites' personnel with any regulatory impacts presented with the sites' report. This assessment has consisted of examinations of hazardous material storage areas throughout the organization, adjustment of documented hazardous material inventories, and review of projected or anticipated projects involving hazardous materials.

As expected, the only EMEF facility presently impacted by the recently issued Environmental Protection Agency (EPA) Risk Management Plan (RMP) rule (40 CFR 68) is the K-25 Site Sanitary Water Plant (K-1515). Quantities of chlorine at the facility exceed both the Occupational Safety and Health Administration (OSHA) Process Safety Management (PSM) Rule (29 CFR 1910.119) and EPA RMP threshold quantities (TQs). Compliance measures with OSHA PSM requirements are in place at K-1515 and facility management is aware of RMP impacts for the facility. RMP compliance measures for K-1515 are reviewed in an attachment to this correspondence. No other EMEF facilities have hazardous material inventories approaching 10 percent (10%) of RMP thresholds.

However, facilities such as the Toxic Substance Control Act (TSCA) Incinerator complex and future operations could potentially introduce quantities of hazardous materials to the sites which could approach or exceed regulatory limits. Various criteria have been established to address quantities of hazardous materials and waste located and treated at TSCA Incinerator. TSCA Incinerator management is aware of potential RMP impacts resulting from storage, processing or treatment of RMP-regulated materials. Current configuration management guidelines require evaluations of significant changes to facilities or operations associated with hazardous materials. These guidelines require evaluation of hazardous materials in regard to various regulatory issues such as the PSM rule.

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Inventory tracking at the K-25 and Paducah Sites will be maintained through the Hazardous Material Information System (HMIS) to ensure TQs are not exceeded without proper safety evaluations (PSM/RMP review, Unreviewed Safety Question Determination, etc.). The Portsmouth site will continue to use their site-specific inventory management system. As part of the assessment for RMP impacts, intensive effort to update and verify HMIS data was expended at the K-25 Site. Monthly reviews of hazardous material inventories and updates to HMIS have been instituted at K-25 to allow enhanced awareness of site hazardous material inventories.

If you have any questions concerning the hazardous material assessment, please contact S. T. Holder at the K-25 Site, R. M. Wilkerson at the Paducah Site, or M. H. Schiering at the Portsmouth Site.

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